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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
BRIAN WOODSON,  
  
Defendant.

No.: CR 06-330 SI

PARTIES' STIPULATION AND  
PROPOSED ORDER EXCLUDING  
TIME UNDER SPEEDY TRIAL ACT

The parties stipulate and agree, and the Court finds and holds, as follows:

1. The parties last appeared before this Court on July 28, 2006 for status. At the request of the defendant, a settlement conference was scheduled with the Honorable Joseph C. Spero.

2. The defendant requested an exclusion of time because of the ancillary proceedings to be held before Magistrate Judge Spero and effective preparation of counsel.

3. The parties move that the time period from July 28, 2006 through September 26, 2006, the next calendared date before Magistrate Spero, be excluded from the calculation of time under the Speedy Trial Act due to effective preparation of counsel and the pending ancillary proceedings.

4. In light of the foregoing facts, the failure to grant the requested exclusion would unreasonably deny counsel for the defense the reasonable time necessary for effective

preparation, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(A),  
(B)(iv). The ends of justice would be served by the Court excluding the proposed time period.  
These ends outweigh the best interest of the public and the defendant in a speedy trial. See id. §  
3161(h)(8)(A). 7/28/06 to 9/26/06

5. For the reasons stated, the time period from July 7, 2006 through July 21, 2006, shall be  
excluded from the calculation of time under the Speedy Trial Act.

SO STIPULATED.

DATED: 9/22/06

Respectfully Submitted,

/s/  
SUSAN REED JERICH  
Assistant United States Attorney

DATED: 9/22/06

/s/  
GEOFFREY HANSEN  
Counsel for Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:

  
HON. SUSAN Y. ILLSTON  
Judge, United States District Court

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Parties' Stipulation and Proposed Order in the case of United States v. Brian Woodson No. CR 06-330 SI , was served today as follows:

Hand Delivery  
Geoffrey Hansen, Esq.  
Federal Public Defender's Office

I certify under penalty of perjury that the foregoing is true and correct.

Executed on September 22, 2006 at San Francisco, California.

/s/  
Rawaty Yim  
United States Attorney's Office